

The Honorable Kymberly K. Evanson

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STEVEN FLOYD, et al., individually and
on behalf of all other similarly situated,

Plaintiff,

V.

AMAZON.COM INC. and APPLE INC.,

Defendants.

Case No. 2:22-cv-01599 KKE

**DECLARATION OF MARK S. PARRIS
IN SUPPORT OF APPLE INC.'S
MOTION FOR COSTS AND
ATTORNEYS' FEES**

I, Mark S. Parris, hereby declare as follows:

1. I am a partner at Orrick, Herrington & Sutcliffe LLP, local counsel for Apple Inc. (“Apple”) in this action. I am over the age of 18 and competent to testify to the facts below.

2. I have been practicing law since 1983. Before joining Orrick, I was a partner at Heller Ehrman LLP. I have represented clients from myriad industries, including Fortune 500 companies. I am familiar with the hourly rates charged in the Western District of Washington and by Seattle-area law firms and other firms engaged in various types of litigation. I have served and testified as an expert witness on the reasonableness of attorney rates and fees in the Western District of Washington on multiple occasions. In that role and more generally reviewing the bills and fee applications of other lawyers I am familiar with the prevailing standard in the Western District of Washington concerning the amount and nature of work that is reasonable in the context of a particular litigation effort. I have also reviewed decisions by Washington state courts and the U.S. District Court for the Western District on the reasonableness of rates and fees.

PARRIS DECLARATION IN SUPPORT OF
APPLE INC.'S MOTION FOR COSTS AND
ATTORNEYS' FEES : 2:22-cv-01599 KKE

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1 3. The Orrick attorneys who worked on the matters for which Apple seeks fees were
 2 myself and Aaron P. Brecher. The time devoted by each person is included in **Exhibit A**. These
 3 billing records have been truncated to remove individual billing narratives to remove client
 4 confidences, work product, and privileged matters. If the Court deems it necessary to review
 5 detailed billing narratives for each time entry, I can supplement this application with that detail
 6 for *in camera* review.

7 4. All work related to these motions was done in 2024. Orrick's billing rate for my
 8 work in this matter was \$900 in 2024. I graduated with honors from the University of
 9 Washington School of Law in 1983. I am currently the Chair of Orrick's Global Litigation
 10 Business Unit. I have tried dozens of cases—both jury and non-jury trials—and mediated and
 11 arbitrated more than 75 cases. I have been repeatedly recognized by publications such as
 12 *Chambers USA*, *Benchmark*, *America's Top 100 Bet the Company Lawyers*, and others for the
 13 quality of my work. I believe the rate charged for my work in this matter is reasonable relative
 14 to prevailing rates for comparable work in this District.

15 5. Orrick's billing rate for the work of Aaron Brecher in this matter was \$650 in
 16 2024. Mr. Brecher graduated with high honors from the University of Michigan Law School in
 17 2013. He clerked on the U.S. District Court for the Central District of California and the U.S.
 18 Court of Appeals for the Ninth Circuit. He has maintained a nationwide litigation practice, with
 19 extensive trial experience—including first-chair trial experience in this District—for the last ten
 20 years. He has been recognized as a Rising Star by *Washington Super Lawyers* every year since
 21 2017. I believe that the rate charged for his work in this matter is reasonable relative to prevailing
 22 rates for comparable work in this District.

23 6. Apple seeks reimbursement for Orrick's fees in the amount of \$6,455.00

24 7. Applying Orrick's billing rates for this matter to co-counsel from Weil, Gotshal
 25 & Manges LLP yields the following hourly rates.

26 8. Orrick billing rates would have been \$900 in 2024 for the work of Mark A. Perry,

1 a partner who graduated law school in 1991.

2 9. Orrick billing rates would have been \$750 in 2024 for the work of Eric Hochstadt,
3 a partner who graduated law school in 2003.

4 10. Orrick billing rates would have been \$695 for the work of Brian Liegel, who was
5 counsel until January 1, 2025 (and is now a partner), who graduated law school in 2015.

6 11. Orrick's billing rates would have been \$695 in 2024 for Morgan MacBride,
7 counsel who graduated from law school in 2014.

8 12. Orrick's billing rates would have been \$585 in 2024 for Geneva Hardesty, an
9 associate who graduated law school in 2019.

10 13. Orrick's billing rates would have been \$585 in 2024 for Daniel Baquet, an
11 associate who graduated law school in 2020.

12 14. Orrick's billing rates would have been \$445 in 2024 for Katie Black, an associate
13 who graduated law school in 2021.

14 15. Orrick's billing rates would have been \$445 in 2024 for Shivangi Bhatia, an
15 associate who graduated law school in 2021.

16 16. Orrick's billing rates would have been \$445 in 2024 for Kathryn Buggs, an
17 associate who graduated law school in 2023.

18 17. Orrick's billing rates would have been \$280 in 2024 for the work of Roy Gilchrist
19 and Herbert Chan, highly experienced paralegals each with more than 20 years experience.

20 I declare under penalty of perjury under the laws of the United States that the foregoing
21 is true and correct to the best of my knowledge and belief.

22 SIGNED this 2nd day of May, 2025 in Seattle, Washington.

23 *s/Mark S. Parris* _____
24 Mark S. Parris

25

26

27

28

Exhibit A

Exhibit A

| Date | Timekeeper | Title | Law School | Hours | Local Rate | Local Billed |
|-------------|-------------------|--------------|-------------------|--------------|-------------------|---------------------|
| | | | Graduation | | | |
| Year | Worked | \$ | \$ | \$ | \$ | \$ |
| 5/13/2024 | Parris, Mark | Partner | 1983 | 1.1 | 900.00 | 990.00 |
| 5/14/2024 | Parris, Mark | Partner | 1983 | 0.4 | 900.00 | 360.00 |
| 5/16/2024 | Parris, Mark | Partner | 1983 | 0.9 | 900.00 | 810.00 |
| 5/17/2024 | Parris, Mark | Partner | 1983 | 2.3 | 900.00 | 2,070.00 |
| 11/5/2024 | Parris, Mark | Partner | 1983 | 1.1 | 900.00 | 990.00 |
| 5/14/2024 | Brecher, Aaron | Associate | 2013 | 0.3 | 650.00 | 195.00 |
| 5/16/2024 | Brecher, Aaron | Associate | 2013 | 0.2 | 650.00 | 130.00 |
| 5/17/2024 | Brecher, Aaron | Associate | 2013 | 0.6 | 650.00 | 390.00 |
| 10/4/2024 | Brecher, Aaron | Associate | 2013 | 0.7 | 650.00 | 455.00 |
| 10/21/2024 | Brecher, Aaron | Associate | 2013 | 0.1 | 650.00 | 65.00 |
| | | | | 7.7 | | \$ 6,455.00 |